

Transcript of Charles Beegle
Conducted on October 27, 2023

1 (1 to 4)

<p>1 IN THE UNITED STATES COURT 2 FOR THE DISTRICT OF MARYLAND 3 NORTHERN DIVISION</p> <p>4 ----- 5 ANDREEA IACOBETI, 6 Plaintiff, 7 v. Case No.: 8 GENNA LEIGH ROSE WEEKS, 1:23-CV-1758 9 Defendant. 10 -----</p> <p>11 Mobile Videoconference Deposition of 12 CHARLES BEEGLE 13 Conducted Virtually 14 Friday, October 27, 2023 15 3:15 p.m.</p> <p>16 Job No.: 511219 17 Pages 1 through 78 18 Reported by: Peggy L. Dingle 19 20 21 22</p>	<p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF PLAINTIFF:</p> <p>3 WILLIAM C. HUDSON, ESQUIRE 4 Law Office of William C. Hudson 5 9748 Stephen Decatur Highway 6 Suite 111 7 Ocean City, Maryland 21842 8 (410)390-7745</p> <p>9</p> <p>10</p> <p>11</p> <p>12 ON BEHALF OF DEFENDANT:</p> <p>13 DAVID H. FLEISHMAN, ESQUIRE 14 Budow and Noble, P.C. 15 Twinbrook Metro Plaza 16 12300 Twinbrook Parkway 17 Suite 540 18 Rockville, Maryland 20852 19 (301)654-0896</p> <p>20 21 22</p>																
<p>1 Mobile videoconference deposition of 2 CHARLES BEEGLE, conducted virtually:</p> <p>3 4 5 6</p> <p>7 Pursuant to agreement, before Peggy L. 8 Dingle, E-Notary Public of the State of Maryland. 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 C O N T E N T S</p> <table> <tr> <td>2 EXAMINATION OF CHARLES BEEGLE</td> <td>PAGE</td> </tr> <tr> <td>3 By Mr. Fleishman</td> <td>5</td> </tr> <tr> <td>4 By Mr. Hudson</td> <td>39</td> </tr> <tr> <td>5 By Mr. Fleishman</td> <td>69</td> </tr> <tr> <td>6 By Mr. Hudson</td> <td>73</td> </tr> </table> <p>7</p> <p>8</p> <p>9</p> <p>10 E X H I B I T S</p> <p>11 (Retained by Counsel)</p> <table> <tr> <td>12 BEEGLE DEPOSITION EXHIBIT</td> <td>PAGE</td> </tr> <tr> <td>13 1 Photograph</td> <td>17</td> </tr> <tr> <td>14 2 Photograph</td> <td>22</td> </tr> </table> <p>15 16 17 18 19 20 21 22</p>	2 EXAMINATION OF CHARLES BEEGLE	PAGE	3 By Mr. Fleishman	5	4 By Mr. Hudson	39	5 By Mr. Fleishman	69	6 By Mr. Hudson	73	12 BEEGLE DEPOSITION EXHIBIT	PAGE	13 1 Photograph	17	14 2 Photograph	22
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5 (17 to 20)

<p>17</p> <p>1 that's where we stayed.</p> <p>2 Q And this is going -- I am going to</p> <p>3 mark this as Beegle Exhibit 1.</p> <p>4 A Yes.</p> <p>5 (Beegle Deposition Exhibit 1 was</p> <p>6 marked for identification, not attached to the</p> <p>7 transcript and retained by counsel.)</p> <p>8 BY MR. FLEISHMAN:</p> <p>9 Q And you will see there is a red kind</p> <p>10 of dot here. The Quality --</p> <p>11 A Uhm-hum.</p> <p>12 Q Is that the Quality Inn you are</p> <p>13 referring to?</p> <p>14 A Yes, it is.</p> <p>15 Q Okay. And then this is 17th Street</p> <p>16 here?</p> <p>17 A Yup.</p> <p>18 Q Okay. So then starting at the Quality</p> <p>19 Inn tell me just --</p> <p>20 A Okay. So I am going to go from the</p> <p>21 top of the screen as being north. I don't know</p> <p>22 if that's north or not.</p>	<p>19</p> <p>1 where my son and I had crossed. Okay? We were</p> <p>2 walking over to the CVS to get a case of water.</p> <p>3 Whenever we got to where your hand is now we</p> <p>4 noticed that the lights were not working. They</p> <p>5 were all just flashing.</p> <p>6 So my son and I, we started crossing,</p> <p>7 when the traffic was clear, to the middle. So we</p> <p>8 started to venture to the middle and then we</p> <p>9 stopped again. Whenever we stopped in the middle</p> <p>10 we noticed that the younger lady was above us at</p> <p>11 the next set of lines up and she was crossing and</p> <p>12 she was looking down at her phone and she had her</p> <p>13 earbuds in and she was not paying attention.</p> <p>14 And whenever she made it to the</p> <p>15 center, she walked out. There was a car stopped</p> <p>16 in the turning lane on Philadelphia Ave going</p> <p>17 south. She walked in front of it and whenever</p> <p>18 she crossed over in front of that parked car</p> <p>19 that's when she got hit. And my son and I saw --</p> <p>20 saw her get hit.</p> <p>21 And then --</p> <p>22 Q Okay. Oh, I am sorry. Keep going.</p>
<p>18</p> <p>1 Q Well, let's do this. So for purposes</p> <p>2 of your explanation let's say going up towards</p> <p>3 the screen is north --</p> <p>4 A Yes.</p> <p>5 Q -- going down towards the screen is</p> <p>6 south.</p> <p>7 A Yes.</p> <p>8 Q And we will say going to the left is</p> <p>9 west and to the right is east.</p> <p>10 A Perfect.</p> <p>11 Q Okay.</p> <p>12 A Okay. You want me to start?</p> <p>13 Q Yep.</p> <p>14 A Okay. So we come out of the hotel and</p> <p>15 we walk north on Baltimore up to 17th Street.</p> <p>16 And then we went west down 17th Street towards</p> <p>17 Philadelphia Ave. And whenever we got to the</p> <p>18 first set of dashed lines -- can you move your</p> <p>19 hand so I -- yeah, move it over to the left.</p> <p>20 Over. Over. Over. Right -- nope. Down. To</p> <p>21 the left a little bit. Yeah, right there.</p> <p>22 So we walked to right there and that's</p>	<p>20</p> <p>1 A And then me and my son -- my son and I</p> <p>2 stared for a second. And I told him, Don't look,</p> <p>3 and we crossed over and went in the CVS.</p> <p>4 Q Okay. So that was -- I am just going</p> <p>5 to walk through kind of piece by piece, if that's</p> <p>6 okay, to confirm some things.</p> <p>7 A Yeah.</p> <p>8 Q All right. So looking at Beegle</p> <p>9 Exhibit 1, you walk out of the Quality Inn, you</p> <p>10 walk north on Baltimore Avenue up to 17th Street,</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q And then you walk west on 17th Street</p> <p>14 to the intersection of Philadelphia Avenue and</p> <p>15 17th Street?</p> <p>16 A That is correct.</p> <p>17 Q And the -- the young lady who you are</p> <p>18 referring to is the person you saw get hit?</p> <p>19 A Yes.</p> <p>20 Q Okay. Had you seen her previously?</p> <p>21 A Yes. I -- now I am just -- you said</p> <p>22 don't speculate but I am almost a hundred percent</p>

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6 (21 to 24)

<p style="text-align: right;">21</p> <p>1 sure she was the worker in the Quality Inn that 2 rode down in the elevator with us. 3 Q Okay. And so did you walk over -- 4 were you all walking together? Did you walk 5 separately? 6 A We walked separately. I think she 7 crossed above us at Baltimore and 17th Street. I 8 think she went up one -- to the next set of 9 crosswalks and crossed over but I am not sure how 10 she -- how she crossed. 11 Q Okay. But you recognized her from 12 working at the Quality Inn? 13 A Yes, riding down in the elevator with 14 us. 15 Q And while you were in the elevator 16 with her did you notice anything? Was she -- you 17 mentioned headphones. Was she wearing headphones 18 at that time? 19 A Yeah, she had her earbuds in in the 20 elevator, yes. 21 Q And do you remember what kind of 22 headphones?</p>	<p style="text-align: right;">23</p> <p>1 The -- there is two crosswalks: One 2 at Philadelphia -- one at north Philadelphia 3 Avenue and 17th and one south at Philadelphia 4 Avenue and 17th Street. Do you see those? 5 A Yes. 6 Q Okay. And if you look to the left of 7 this photo you will see it says CVS Pharmacy over 8 here? 9 A Yup. 10 Q Is that the CVS that you were going 11 to? 12 A Yes. 13 Q Okay. And you are on 17th Street. 14 Before you crossed the -- before you crossed 15 Philadelphia Ave you are at the southern 16 crosswalk; is that correct? 17 A That is correct. 18 Q All right. And where was the 19 pedestrian, the female that you saw? 20 A When -- before we crossed? 21 Q Before you crossed? 22 A That I am not sure.</p>
<p style="text-align: right;">22</p> <p>1 A They looked like Apple AirPods. They 2 were the wireless ones. 3 Q And do you know if she was listening 4 to anything? 5 A That I don't know. I couldn't hear 6 anything. 7 Q All right. So I am going to now 8 switch to what I am going to mark as Beegle 9 Exhibit 2. 10 (Beegle Exhibit Number 2 was marked 11 for identification, not attached to the 12 transcript and retained by counsel.) 13 BY MR. FLEISHMAN: 14 Q And can you see my screen? 15 A Yes. 16 Q All right. And would you agree with 17 me that this is an overview just of the 18 intersection where this incident occurred? 19 A Yup. 20 Q All right. And so you had indicated 21 in the -- I am sorry. This is Beegle Exhibit 2 22 if I didn't say that.</p>	<p style="text-align: right;">24</p> <p>1 Q All right. 2 A I wasn't paying any attention to her. 3 The only time I noticed her was whenever we made 4 it to the center and we looked north for oncoming 5 traffic and that's when I noticed her walking. 6 Q All right. So you crossed halfway 7 through the intersection, the southern 8 intersection? 9 A That is correct. 10 Q And you are at the median area? 11 A Yeah. 12 Q And that's the first time that you saw 13 her? 14 A Yes. 15 Q And -- 16 A Because we were actually looking north 17 for -- for oncoming cars before we could cross. 18 Q Okay. 19 A Because whenever I was looking north I 20 saw her still continuing to walk. 21 Q Where was she the first -- where was 22 she in the northern crosswalk the first time you</p>

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7 (25 to 28)

<p>25</p> <p>1 saw her?</p> <p>2 A I would say probably in front of that</p> <p>3 white car on the northbound side. See where that</p> <p>4 car is?</p> <p>5 Q Yeah, the white car with the -- what</p> <p>6 looks like a black top?</p> <p>7 A Yes.</p> <p>8 Q And --</p> <p>9 A That's when I would have first noticed</p> <p>10 her.</p> <p>11 Q And then tell me -- you are looking at</p> <p>12 her. Tell me what you see happen to her from</p> <p>13 there?</p> <p>14 A Okay. So we are standing at the -- at</p> <p>15 the median there and we are looking at traffic</p> <p>16 coming north. And I see her and she has her head</p> <p>17 down and her phone, not paying attention.</p> <p>18 Like I said, all the lights were</p> <p>19 flashing because they weren't -- they were not</p> <p>20 working. And I kept watching her and looking at</p> <p>21 traffic. And there was a car in that turning</p> <p>22 lane beside that white car on the other side. It</p>	<p>27</p> <p>1 was in?</p> <p>2 A Right beside the turning lane.</p> <p>3 Q In this --</p> <p>4 A Right --</p> <p>5 Q -- this lane?</p> <p>6 A Yup, yup.</p> <p>7 Q When is the first time that you saw</p> <p>8 that car?</p> <p>9 A Right about as she was in the middle</p> <p>10 of the stopped car in the turning lane is when I</p> <p>11 noticed the other car.</p> <p>12 Q When the pedestrian?</p> <p>13 A Yeah. So that car in the -- that was</p> <p>14 stopped in the turning lane, when the pedestrian</p> <p>15 was, like, dead center in front of that is when I</p> <p>16 noticed that car coming down in the other lane.</p> <p>17 Q When the -- okay. When the pedestrian</p> <p>18 was dead center of the car that was stopped in</p> <p>19 the left lane?</p> <p>20 A Correct. That's when I noticed the</p> <p>21 other car.</p> <p>22 Q All right. And did you notice the</p>
<p>26</p> <p>1 was stopped and she continued to walk straight</p> <p>2 without stopping, looking or anything.</p> <p>3 Q Did -- so she walked past the median</p> <p>4 without stopping at the median?</p> <p>5 A Correct.</p> <p>6 Q Okay. Did she slow down at all?</p> <p>7 A No.</p> <p>8 Q There is -- going south on</p> <p>9 Philadelphia Avenue there is a right turn lane,</p> <p>10 you would agree?</p> <p>11 A Yep.</p> <p>12 Q There are three lanes going straight?</p> <p>13 A Correct.</p> <p>14 Q And then there is a left turn lane?</p> <p>15 A Right.</p> <p>16 Q The car that you saw going south that</p> <p>17 you said was parked, where was that car?</p> <p>18 A Right where your cursor is. It was</p> <p>19 stopped right there in that turning lane.</p> <p>20 Q Okay. And did you happen to see the</p> <p>21 car -- so the car that was involved in the</p> <p>22 incident, where -- do you know what lane that car</p>	<p>28</p> <p>1 speed of the other car?</p> <p>2 A I -- I can't honestly say.</p> <p>3 Q Did it appear to be going fast?</p> <p>4 A No. It didn't appear to be going --</p> <p>5 it -- in my honest opinion, it appeared that it</p> <p>6 was going the speed limit. I seen some of those</p> <p>7 cars go up through there and they are flying.</p> <p>8 And I -- I honestly 100 percent don't think that</p> <p>9 car was speeding at all. But that's just --</p> <p>10 Q Okay.</p> <p>11 A I -- I can't -- I can't judge that,</p> <p>12 you know.</p> <p>13 Q Sure, sure. The lights you said that</p> <p>14 were not working were -- what lights are you</p> <p>15 referring to?</p> <p>16 A All of them. They were all flashing.</p> <p>17 The ones going northbound, southbound, eastbound,</p> <p>18 westbound.</p> <p>19 Q And you are referring to the traffic</p> <p>20 lights?</p> <p>21 A Yes.</p> <p>22 Q Were the -- were the actual pedestrian</p>

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8 (29 to 32)

<p>29</p> <p>1 signals were those working at all?</p> <p>2 A I can't remember. I don't remember</p> <p>3 those.</p> <p>4 Q Okay. You don't remember whether they</p> <p>5 were working or were not working?</p> <p>6 A Right.</p> <p>7 Q After -- the car that was in the left</p> <p>8 lane that was stopped --</p> <p>9 A Okay.</p> <p>10 Q -- did it appear that car stopped so</p> <p>11 that the pedestrian could go or was it already</p> <p>12 stopped there and she just walked in front of it?</p> <p>13 A I think it was already stopped there.</p> <p>14 Q Okay. Were there any other cars that</p> <p>15 you saw coming southbound on Philadelphia Avenue</p> <p>16 while you were waiting at the median with your</p> <p>17 son?</p> <p>18 A Yes, I do remember another car that</p> <p>19 was beside the other turning lane coming down</p> <p>20 through. That's the only other car I remember.</p> <p>21 Q And do you mean in the right turning</p> <p>22 lane or do you mean the -- the straight lane</p>	<p>31</p> <p>1 the edge of the median.</p> <p>2 Q And obviously Google Maps is tough to</p> <p>3 tell. If you were to estimate feet, how far from</p> <p>4 seeing the accident were you?</p> <p>5 A Oh, I would say 100 -- 150 feet,</p> <p>6 maybe, if that. Probably a hundred.</p> <p>7 Q Okay. Is there anything that was</p> <p>8 obstructing your vision of seeing what happened,</p> <p>9 other than just the space between the</p> <p>10 intersection?</p> <p>11 A Nope. I saw it plain as day.</p> <p>12 Q At any point -- I guess I kind of</p> <p>13 asked this but at any point while the pedestrian</p> <p>14 was crossing the street did she -- did you see</p> <p>15 her look up?</p> <p>16 A No. I don't even think she saw that</p> <p>17 car coming.</p> <p>18 Q Okay. At any point did you see her</p> <p>19 slow down?</p> <p>20 A Are you talking the pedestrian?</p> <p>21 Q The pedestrian, yeah.</p> <p>22 A No, I don't think she slowed down at</p>
<p>30</p> <p>1 that's next --</p> <p>2 A That lane right there.</p> <p>3 Q All right. So that would be the --</p> <p>4 the straight lane next to the right turning lane?</p> <p>5 A That is correct.</p> <p>6 Q And that vehicle passed through the</p> <p>7 intersection? What did that vehicle do?</p> <p>8 A Yeah, it went complete -- it went</p> <p>9 straight through the intersection.</p> <p>10 Q Was that before or after the --</p> <p>11 A It was almost like simu --</p> <p>12 simultaneously.</p> <p>13 Q Okay. And other than that car and the</p> <p>14 car involved in the incident and the car that was</p> <p>15 stopped in the left turn lane, did you observe</p> <p>16 any other cars coming southbound?</p> <p>17 A I did not. Not that I can remember.</p> <p>18 Q And are you -- approximately how far</p> <p>19 are you standing at that median on the southern</p> <p>20 crosswalk from the northern crosswalk where the</p> <p>21 accident happened?</p> <p>22 A So I was -- I was standing right at</p>	<p>32</p> <p>1 all.</p> <p>2 Q All right. At any --</p> <p>3 A She was looking down and just walking</p> <p>4 her normal stride.</p> <p>5 Q At any point and I know this sounds</p> <p>6 repetitive but I just want it to be kind of</p> <p>7 clear. At any point did you see her look to her</p> <p>8 right?</p> <p>9 A I did not.</p> <p>10 Q Okay. At any point did you see her</p> <p>11 look to her left?</p> <p>12 A I did not.</p> <p>13 Q After you came back out of the CVS</p> <p>14 what happened?</p> <p>15 A So after we come out of the CVS I had</p> <p>16 my case of water and we walked over to where that</p> <p>17 first tree is on the sidewalk. And I believe</p> <p>18 there was a police officer standing there and I</p> <p>19 told him, I saw the whole thing. And he asked me</p> <p>20 for what I saw and he wrote everything down.</p> <p>21 Q All right. So you told the police</p> <p>22 officers what you recalled happening?</p>

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11 (41 to 44)

<p>41</p> <p>1 A I believe so, yes.</p> <p>2 Q Okay. And the conversation that you</p> <p>3 had with her, did it -- was -- was -- was it just</p> <p>4 momentary or was it a conversation that lasted</p> <p>5 the duration of the ride down?</p> <p>6 A No, it was just a momentary. I -- I</p> <p>7 think I asked her if she was on lunch break or</p> <p>8 something.</p> <p>9 Q Do you recall what her response was?</p> <p>10 A I think she said, Yes, I am going to</p> <p>11 lunch, and that was all, the only conversation we</p> <p>12 had.</p> <p>13 Q Okay. Did you -- did -- did all three</p> <p>14 of you get off at the same floor?</p> <p>15 A Yes.</p> <p>16 Q Did you get on the elevator on the</p> <p>17 same floor?</p> <p>18 A Yes.</p> <p>19 Q Okay. Do you have any idea what work</p> <p>20 she was doing before taking that break?</p> <p>21 A I think she -- I know you said don't</p> <p>22 think but I am pretty sure she was a housekeeper.</p>	<p>43</p> <p>1 Q Did -- did she say anything to you</p> <p>2 that gave you an indication one way or the other</p> <p>3 as to whether she was in a hurry?</p> <p>4 A No, she didn't.</p> <p>5 Q Did -- did anything in her demeanor,</p> <p>6 her -- her manner of walking, you know, brisk</p> <p>7 walk versus a casual, leisurely walk, was there</p> <p>8 anything in her demeanor that suggested one way</p> <p>9 or the other to you?</p> <p>10 A No.</p> <p>11 Q Okay.</p> <p>12 A To be honest, I didn't pay attention</p> <p>13 that well to her.</p> <p>14 Q Okay. Fair enough. Now, I believe</p> <p>15 you indicated in your earlier testimony that the</p> <p>16 next time you took note of her you and your son</p> <p>17 were already standing in the center median</p> <p>18 looking north for approaching southbound traffic</p> <p>19 and that's when you again saw her as she was in</p> <p>20 the process of crossing westbound on the north</p> <p>21 side of the intersection; is that correct?</p> <p>22 A That's correct, yes.</p>
<p>42</p> <p>1 Q Okay. Was she wearing any type of</p> <p>2 uniform that suggested that to you?</p> <p>3 A Yes, and she had a -- had a Quality</p> <p>4 Inn badge with her name and I can't remember what</p> <p>5 her name was.</p> <p>6 Q Okay. And -- and I -- what -- what</p> <p>7 floor did you exit the elevator on?</p> <p>8 A The first floor.</p> <p>9 Q Okay. And is that the ground level?</p> <p>10 A Yeah.</p> <p>11 Q And did the three of you exit the</p> <p>12 hotel together or did she go elsewhere such that</p> <p>13 you didn't exit together?</p> <p>14 A I know we got off at the same floor on</p> <p>15 the ground level but after that I am not sure</p> <p>16 which way she went.</p> <p>17 Q Okay. Did she appear to be in any</p> <p>18 hurry?</p> <p>19 A I don't want to speculate. You said</p> <p>20 don't speculate but I know you don't get very</p> <p>21 long for lunch. So I am sure she was in a hurry</p> <p>22 to go do whatever she was doing and get back.</p>	<p>44</p> <p>1 Q And I take it -- I take it that means</p> <p>2 you didn't see her at any time between those two</p> <p>3 points in time; is that right?</p> <p>4 A That is correct. The only time I saw</p> <p>5 her was when she was about in front of that white</p> <p>6 car in the picture right now.</p> <p>7 Q Okay. And from the time you saw her,</p> <p>8 as you described, in front of the white car in</p> <p>9 the picture to the point she was struck are you</p> <p>10 able to estimate how much time elapsed?</p> <p>11 A From the time I saw her until the time</p> <p>12 she got struck?</p> <p>13 Q Yes.</p> <p>14 A Oh, I would say maybe 30 seconds. It</p> <p>15 wasn't long.</p> <p>16 Q Okay. Thirty seconds?</p> <p>17 A (The witness nodded his head.)</p> <p>18 Q Okay. When you saw her was she -- was</p> <p>19 she the only one crossing or were there others</p> <p>20 crossing as well?</p> <p>21 A There were people crossing behind her.</p> <p>22 They were behind her. So she was ahead of them.</p>


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20 (77 to 80)

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1 after our settlement conference. I have got a
2 very cost-conscious client.
3 COURT REPORTER: Got it. Understood
4 MR. FLEISHMAN: And I think we have a
5 standard order.
6 COURT REPORTER: Sounds good.
7 (Signature having been waived, the
8 deposition of CHARLES BEEGLE was concluded at
9 4:30 p.m.)
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78

1 CERTIFICATE OF SHORTHAND REPORTER/E-NOTARY PUBLIC
2 I, PEGGY L. DINGLE, the officer before
3 whom the foregoing proceedings were taken, do
4 hereby certify the foregoing transcript is a true
5 and correct record of the proceedings; that said
6 proceedings were recorded by me stenographically
7 and thereafter reduced to typewriting under my
8 supervision; and that I am neither counsel for,
9 related to, nor employed by any of the parties in
10 the foregoing proceeding and caption named and
11 have no interest, financial or otherwise, in the
12 outcome of the cause named in said caption.
13 IN WITNESS WHEREOF, I have hereunto set
14 my hand and affixed my seal this 9th day of
15 November 2023.
16
17 My commission expires:
18 August 1, 2026
19 
20 _____
21 E-NOTARY PUBLIC IN AND FOR
22 THE STATE OF MARYLAND